

1 John M. Nolan, Esq. (NSBN 15790)
2 2750 Peavine Creek Road
3 Reno, Nevada 89523
4 jmnolan84@gmail.com

5 Michael Langton, Esq. (NSBN 290)
6 801 Riverside Drive
7 Reno, NV 89503
8 Telephone: (775) 329-3612
9 mlangton@sbcglobal.net

10 Mark Mausert, Esq. (NSBN 2398)
11 Sean McDowell, Esq. (NSBN 15962)
12 729 Evans Avenue
13 Reno, Nevada 89512
14 Telephone: (775) 786-5477
15 mark@markmausertlaw.com

16 *Attorneys for Plaintiff*

Kiah D. Beverly-Graham, NV Bar No. 11916
General Counsel
Truckee Meadows Community College
2215 Raggio Parkway
Reno, Nevada 89512-1095
(775) 673-7396
(775) 673-7135 fax
kiah.beverly@dri.edu

Attorney for Defendants

17
18
19
20
21
22
23
24
25
26
27
28
**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LARS JENSEN, an individual,

Plaintiff,

v.

NATALIE BROWN, et al.

Defendants.

Case No. 3:22-cv-00045-ART-CLB

**SECOND JOINT CASE
MANAGEMENT REPORT**

Pursuant to Judge Carla Baldwin's in Court Order to File Case Management Report (ECF 41), the parties are submitting this Joint Case Management Report in advance of the Virtual Case Management Conference set for January 17, 2023, at 11:00 a.m. For the reasons discussed below, the Parties agree it would be appropriate for the Court to vacate the Case Management conference and take it off calendar.

1 The Court ordered the parties to address the following issues in the Joint Case
2 Management Report:

3 ***1. Counsel shall specifically outline what discovery has been completed since the last***
4 ***conference;***

5 Since the last Virtual Case Management Conferences held on June 8, 2022, and July 13,
6 2022, the parties have completed the following discovery:

7
8 a. The parties outline of completed discovery:

- 9 i. On July 4, 2022, Plaintiff sent Defendants' counsel Plaintiff's
10 Initial Disclosures.
- 11 ii. On July 5, 2022, Defendants' counsel sent Defendants' Initial
12 Disclosure Statement, accompanied by a production of 2,285 pages
13 of documents.
- 14 iii. On September 15, 2022, Plaintiff sent Defendants' counsel
15 Plaintiff's First Request for Production of Documents.
- 16 iv. On October 17, 2022, Defendant's counsel sent Defendants'
17 Responses and Objections to Plaintiff's First Request for
18 Production of Documents.
- 19 v. On November 3, 2022, Defendants' counsel sent All Defendants'
20 First Set of Requests for Production to Plaintiff.
- 21 vi. On November 3, 2022, Defendants' counsel sent Defendants' First
22 Supplemental Initial Disclosure Statement.
- 23
24
25
26
27
28

- vii. On November 3, 2022, Defendants' counsel sent one set of production, which contained 2 electronic files of approximately 401 pages of PDF materials.
- viii. On November 23, 2022, the parties filed a Proposed Stipulated Order Regarding Confidentiality of Discovery Material. This was entered as an Order of the Court on November 28, 2022 (ECF 50).
- ix. On December 2, 2022, Plaintiff's counsel sent one set of production, which contained 3 electronic files of approximately 3,209 pages of PDF materials.
- x. On December 16, 2022, Defendants' counsel sent Defendants' Second Supplemental Initial Disclosure Statement.
- xi. On December 16, 2022, Defendants' counsel sent three sets of production, which contained 6 electronic files of approximately 685 pages of PDF materials.

2. What discovery is outstanding;

- a. Plaintiff still has additional documents to produce relevant to All Defendants' First Set of Requests for Production to Plaintiff.
- b. Defendants still have additional documents to produce relevant to Plaintiff's First Request for Production of Documents.
- c. All parties still have to send interrogatories.
- d. All parties still have to send requests for admission.

e. The parties need to have a meet and confer conference on January 26, 2023, at 2 p.m. to resolve issues related to the Plaintiff's First Request for Production of Documents.

f. The parties need to schedule depositions.

3. And what, if any, discovery disputes are ready for the Court's consideration;

a. At this time, the parties do not believe any discovery disputes are ready for the Court's consideration. For that reason, the parties believe that the case management conference scheduled for January 17, 2023, may be vacated and taken off-calendar and respectfully request that the Court so order.

DATED: January 10, 2023

/s/ John M. Nolan
John M. Nolan, Esq. (NSBN 15790)
2750 Peavine Creek Road
Reno, Nevada 89523
jmnolan84@gmail.com

Michael Langton, Esq. (NSBN 290)
801 Riverside Drive
Reno, NV 89503
Telephone: (775) 329-3612
mlangton@sbcglobal.net

Mark Mausert, Esq. (NSBN 2398)
Sean McDowell, Esq. (NSBN 15962)
729 Evans Avenue
Reno, Nevada 89512
Telephone: (775) 786-5477
mark@markmausertlaw.com

Attorneys for Plaintiff

DATED: January 10, 2023

/s/ Kiah D. Beverly-Graham

Kiah D. Beverly-Graham, NV Bar No. 11916

General Counsel

Truckee Meadows Community College

2215 Raggio Parkway

Reno, Nevada 89512-1095

(775) 673-7396

(775) 673-7135 fax

kiah.beverly@dri.edu

Attorney for Defendants